

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN RE: JERRY L. WILLIAMS

CHAPTER 13  
CASE NO. 11-13115

OBJECTION TO SECURED CLAIM(S) AND OTHER RELIEF

COME(S) NOW, Debtor(s), by and through counsel, and file(s) this Objection to the following pre-petition secured claim(s) and request(s) the Court to set the value for the purpose of plan confirmation:

CREDITOR: Green Tree Servicing LLC  
Bankruptcy Dept.  
P.O. Box 6154  
Rapid City, SD 57709

Description of Collateral: 1997 Cavalier 28' x 70' Mobile Home

Amount of Debt: \$69,206.19 the amount alleged to be due.

Treatment: Pay VALUE of \$17,000.00 plus 7% interest and upon payment of same eliminate any lien.

THAT, upon payment of values as set forth herein, the liens be canceled and any title documents be delivered to Debtor(s).

DATED: August 22, 2011.

/s/ Thomas U. Reynolds  
Thomas U. Reynolds, MB#5307

THOMAS U. REYNOLDS  
Attorney for Debtor  
P. O. Drawer 280  
Charleston, MS 38921  
(662) 647-3203

Document Page 2 of 2  
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NOTICE

YOU ARE HEREBY NOTIFIED that a written response to the attached  
Objection to Secured Claim and Other Relief must be filed with:

U.S. BANKRUPTCY COURT CLERK  
703 HWY 145 NORTH  
ABERDEEN, MS 39730

with a copy served on the undersigned Debtor(s) Attorney and the Chapter 13 Trustee, on or before thirty (30) days from the date of this notice, or the Court will enter a Confirmation Order, which shall set the value of each affected secured creditor(s) lien, and which shall sustain this Objection to Secured Claim and Other Relief, granting the relief requested therein. In the event a written response is filed, the Court will notify you of the date, time, and place of the hearing thereon.

DATED: August 22, 2011.

CHAPTER 13 TRUSTEE:  
LOCKE D. BARKLEY  
P.O. BOX 55829  
JACKSON, MS 39296  
(601) 355-6661

/S/Thomas U. Reynolds  
THOMAS U. REYNOLDS  
P.O. DRAWER 280  
CHARLESTON, MS 38921  
(662) 647-3203

CERTIFICATE OF SERVICE

I, Thomas U. Reynolds, Attorney for the Debtor(s), do hereby certify that I have this day mailed a true and correct copy by United States mail, postage prepaid, of the above and foregoing Notice and Objection to Secured Claim and Other Relief to the creditor(s) named therein and at their respective addresses. I further certify that I have delivered same to the U.S. Trustee and the Chapter 13 Trustee via electronic notification at the following email addresses:

Locke D. Barkley, Chapter 13 Trustee: sbearley@barkley13.com

U.S. Trustee: USTPRegion05.AB.ECF@usdoj.gov

DATED: August 22, 2011.

/s/ Thomas U. Reynolds  
Thomas U. Reynolds, MB#5307